

FILED - USDC -NH
2023 AUG 7 PM 1:12

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

FEMI ISIJOLA,

Plaintiff,

v.

**NEW HAMPSHIRE DEPARTMENT
OF SAFETY, AARON R. RICHARDS,
LINDA CAPUCHINO, STACEY K.
SCHULTZ, ELIZABETH BIELECKI,
DONALD BLASZKA, CHRISTOPHER
CASKO, ROBERT QUINN, JESSICA
A. KING, ANTHONY J. GALDIERI,
MARIA E. BUCKMAN, ANDREW R.
SCHULMAN, BRIAN T. TUCKER,
TIMOTHY A. GUDAS, PATRICK
DONOVAN, ANNA BARBARA
HANTZ MARCONI, JAMES BASSETT
AND GARY HICKS.**

Defendants

CASE NO:

**PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION PURSUANT
TO RULE 65 OF THE FEDERAL RULES
OF CIVIL PROCEDURE**

Oral argument requested

AUGUST 7, 2023

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Femi Isijola, ("Plaintiff") respectfully move this Court for a preliminary injunction as set out below and the reasons set out in the accompanying Affidavit in Support of Plaintiff's Motion for Preliminary Injunction and the accompanying Memorandum in Support of Plaintiff's Motion for Preliminary Injunction. Rule 65(a) of the Federal Rules of Civil Procedure. Plaintiff respectfully requests for a preliminary injunction hearing and rule on the merits while preserving his right to Jury Trial in accordance with Rule 65(a)(2) of the Federal Rules of Civil Procedure.

Plaintiff submits that his Motion meets the standards for a Preliminary Injunction, in that he has a substantial likelihood of success on the merits, he will suffer irreparable harm, the balance of equities between the parties-he has no adequate remedy at law and granting him the injunction is in the public interest.

For the reasons articulated and stated in Plaintiff's Memorandum of Law and his Complaint for his violation of his civil and constitutional rights, Plaintiff requests that this Court his Motion and enjoin the Director of the New Hampshire Department of Safety, Division of Motor Vehicles to restored his state issued State of New Hampshire REAL ID Driver's License, currently suspended and in Plaintiff's former name of Philip Israel Mark, so that Plaintiff is provided the mobility to attend all court's appearances, as Plaintiff has requested Jury Trial on all claims triable by Jury and in the interests of constitutional justice.

WHEREFORE, for the foregoing reasons stated above and for those reasons incorporated by reference and those reasons stated in Plaintiff's Memorandum of Law and his Affidavit in Support of his Motion, the Plaintiff respectfully request this Court grant his Motion for Preliminary Injunction pending a decision on the merits of Plaintiff's claims in this matter.

HEARING REQUESTED

Pursuant to Rule 65(a)(2) of the Federal Rules of Civil Procedure, Plaintiff requests a hearing on his Motion for Preliminary Injunction by Video Teleconference, as Plaintiff does not have any available means to appear in Concord, New Hampshire, where presently the District Court is located, if on the other hand, this Court issues a temporary restraining order pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedures that will allowed Plaintiff to drive with his Driver's License and be in Court in person, if this Court scheduled in earnest his requested

Preliminary-Injunction Hearing, Plaintiff will gladly appeared in person in Concord, New Hampshire for his Motion for Preliminary Hearing.

Respectfully submitted,

Femi Isijola, Plaintiff

A handwritten signature in black ink, appearing to read 'Femi Isijola', written over a horizontal line.

Femi Isijola, Pro Se Litigant
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Dated: August 7, 2023